

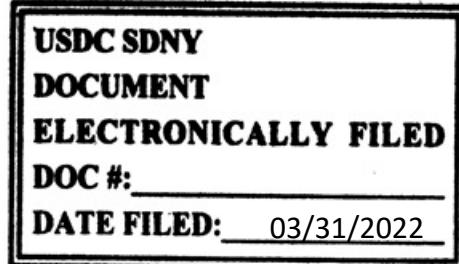
**quinn emanuel trial lawyers | los angeles**

865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100

WRITER'S DIRECT DIAL NO.  
**(212) 849-7345**

WRITER'S EMAIL ADDRESS  
**danbrockett@quinnemanuel.com**

March 25, 2022



**VIA ECF**

Honorable Lorna G. Schofield  
United States District Court Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

Allianz Global Investors GmbH, et al., v. Bank of America Corporation, et al., 1:18-cv-10364

Dear Judge Schofield:

Pursuant to Rules I.B.1 and I.D of Your Honor's Individual Rules and Procedures for Civil Cases, we respectfully seek leave to file under seal certain supporting papers and exhibits to Plaintiffs' Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas. Pursuant to Rule I.D.3, this motion and supporting papers have been publicly filed with the redactions, and unredacted versions have been electronically filed under seal and linked to this application.

This request asks the Court to seal the Third Amended Complaint (already filed under seal), documents that reference numerous chat transcripts that Defendants produced and designated as confidential, copies of the chat transcripts, and personal information about the proposed deponent. Given Defendants designated these materials as "confidential," supporting papers include documents already filed under seal, and sensitive personal information of the deponent is contained within these papers, Plaintiffs respectfully request that the Court grant Plaintiffs permission to file the requested documents in redacted form on ECF and in unredacted form under seal.

**quinn emanuel urquhart & sullivan, llp**

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03531-00008CT/13257909.1

Respectfully submitted,

/s/ Daniel L. Brockett

Daniel L. Brockett

Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
Telephone: (212) 849-7000  
Fax: (212) 849-7100  
danbrockett@quinnmanuel.com

Jeremy D. Andersen (pro hac vice)  
Anthony Alden (pro hac vice)  
Johanna Ong (pro hac vice)  
865 South Figueroa Street, 10th Floor  
Los Angeles, California 90017  
Telephone: (213) 443-3000  
Fax: (213) 443-3100  
anthonyalden@quinnmanuel.com  
jeremyandersen@quinnmanuel.com  
johannaong@quinnmanuel.com

*Counsel for Plaintiffs*

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Request GRANTED. The proposed redactions and sealing requests are narrowly tailored to prevent unauthorized dissemination of sensitive business information. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 11920 (2d Cir. 2006). SO ORDERED.

Dated: March 31, 2022

*Att cl an*

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